

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,)	
Plaintiff)	
v.)	Civil Action No. 04-11935-DPW
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.)	
Defendants)	

AFFIDAVIT OF ELLEN M. CAULO

I, Ellen M. Caulo, being duly sworn, do hereby depose and state:

1. I am Deputy General Counsel for the Suffolk County Sheriff's Department.
2. I am the attorney of record in the matter of Sheila Porter v. Cabral, et al, C.A. No. 04-11935-DPW that was tried before a jury on January 9, 2006 through January 18, 2006.
3. I am an attorney in good standing in the Commonwealth of Massachusetts and the District of Massachusetts.
4. On January 17, 2006 closing arguments were delivered in this matter. The jury began deliberations but retired for the day without returning a verdict.
5. The jury resumed their deliberations on January 18, 2006, returning a verdict late in the afternoon. Throughout the day I repeatedly observed Agent Snyder outside the courtroom while the jury deliberated.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY

/s/ Ellen M. Caulo
Ellen M. Caulo

Dated: February 2, 2006